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The Honorable Eric Komitee
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Aleksandr Zhukov, 18-CR-633 (EK)

Dear Judge Komitee:

We write in response to the Court's order of September 3, 2020, directing defense counsel to report what equipment may be needed so that Mr. Zhukov may review discovery with counsel in advance of trial in the cellblock beneath the Courthouse in Brooklyn.

We learned last week of a breakout of COVID-19 in the Courthouse that we now understand has infected a number of court security officers and possibly others. Even before this development, we did not believe that meeting with Mr. Zhukov as proposed by the government is a viable solution. Mr. Zhukov is exposed every day to multiple officers and inmates. His transport to the Courthouse will occasion more contact with others, and counsel would necessarily meet with him in a confined space. Each member of the defense team is either in a category vulnerable to the consequences of a COVID-19 infection or lives with a vulnerable person. The government's solution is not viable in our view.

This past weekend, I emailed the government and suggested that we might ask the Court to order the Bureau of Prisons to permit Mr. Zhukov to receive an Internet-disabled laptop from the government that contains discovery that can reasonably be uploaded thereto. We have not yet heard back from the government. We propose, if possible, that we advance Friday's scheduled conference to an earlier day this week or to discuss it on Friday.

Respectfully submitted,

/s/Andrew J. Frisch
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cc: All Counsel